

1 Q. How many were there?

2 A. Two of them.

3 Q. Do you remember who they were?

4 A. Jack Baker and Gladys DelGatto.

5 Q. When did they finish White Pigments?

6 A. Well, they kept doing that function for awhile,
7 because I was planning to do -- they just pull me out
8 there because they had something else have to be taken
9 care of.

10 Q. They pulled you out where? I'm sorry.

11 A. Well, from that function that I was doing --

12 Q. That function, you mean the relief?

13 A. The relief devices.

14 Q. Okay.

15 A. To a project, actually going to the site in
16 Edgemoor, here in Delaware. And that was something
17 different, specific to that site.

18 Q. So I'm just going to go over it one more time.
19 Jack and Gladys worked on the relief end with you?

20 A. Relief, they call it pressure relief devices.

21 Q. For the relief devices. That's where they worked
22 as far as White Pigments, was relief devices?

23 A. Yes, yes.

24 Q. And for the Edgemoor, did Jack and Gladys work at



WILCOX & FETZER LTD.
Registered Professional Reporters

B 76

1 Edgemoor at all?

2 A. No, just me.

3 Q. Oh, just you, okay. Did that project, did the
4 Edgemoor project end? Did it conclude?

5 A. After a few months.

6 Q. But there was no one came in and replaced you; is
7 that right?

8 A. No.

9 Q. Okay. Then what was after that?

10 A. I remember just before the White Pigments there
11 was a small project in the General Chemical side here in,
12 oh, gosh, it is between Marcus Hook and the Delaware
13 line. I forget that part of Delaware.

14 Q. We can come back. I don't want to guess. If you
15 remember it we can come back to it. But that project was
16 between --

17 A. General Chemicals.

18 Q. That was the name of the company?

19 A. Yes.

20 Q. And that project was between White Pigments and
21 Old Hickory?

22 A. Correct.

23 Q. How long did that last for?

24 A. About three, three months or four.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 77

1 Q. Were there other engineers on that?

2 A. No, just myself.

3 Q. So then after White Pigments what was next?

4 A. Let's see here. It was a project for the
5 Delaware City Refinery. At that time the name was
6 Motiva.

7 Q. Motiva, okay. That project, is that something
8 you worked on on site or in the BE&K office?

9 A. Mostly BE&K office.

10 Q. How many engineers were on that?

11 A. Besides my discipline?

12 Q. Just your discipline, just yourself.

13 A. Myself and I think John Trexler did some work
14 also.

15 Q. How long was that project?

16 A. Slightly less than a year.

17 Q. And that project ended also?

18 A. Yes.

19 Q. Now, White Pigments, I just want to make sure I
20 have the time line straight, White Pigments, then Motiva.
21 Okay. And how much time? Was there any gap in time
22 between those two projects?

23 A. Hardly anything. Pete Howe was pretty good about
24 how to manage the people around.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 78

1 A. They find something for you to do, you know,
2 anything that you can help with.

3 Q. So it is just on someone else's project maybe?

4 A. Yes, yes.

5 Q. How many people in the Process Department in
6 2000?

7 A. Before the laid offs or after?

8 Q. Before, if you want to start there.

9 A. Let's see. About 11.

10 Q. From Motiva we went to? What was next?

11 A. I was on loan to the Tosco Refining Company in
12 Linden, New Jersey, where I used to work.

13 Q. When you say "on loan," can you explain that for
14 me?

15 A. Okay. Basically, Tosco Refining Company knew
16 that I was working for BE&K, and in a visit that we made
17 to Tosco Refining Company, when I say a visit that we
18 made, it is BE&K, one manager and the other fellow that
19 is supposed to, you know, look jobs for BE&K, and
20 introduced him to the people that I used to work with,
21 and they say, by the way, you know, we need some help for
22 about six months, and we would like Obed to come in and
23 help us. Will you, you know, could you let us have him,
24 and BE&K said yes.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 79

1 Q. You were at that meeting or a meeting, not
2 necessarily the only one?

3 A. Pretty much I was there when they had the request
4 in front of me. That was at the site in New Jersey.

5 Q. So this was Tosco, a new client for them at that
6 point?

7 A. I took the BE&K people to start, you know,
8 getting some relationship with them, introduced them to
9 several people, key people that I knew. And that was
10 basically what happened there.

11 Q. So you had contact there from when you worked
12 there prior?

13 A. Right.

14 Q. Who was the contact or contacts that you had
15 there at that time?

16 A. Her name is Jenney Galli.

17 Q. Jenney Galli?

18 A. G-A-L-L-I. Suzanna Fagan, F-A-G-A-N.

19 Q. And they were Tosco?

20 A. Right, correct.

21 Q. And you set up some kind of, facilitated some
22 sort of contact from BE&K with them?

23 A. Correct.

24 Q. Why don't you tell me about what that was.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 80

1 A. Basically, we went in, you know, we made
2 appointments first, and we went and talked to Jenney
3 Galli, was I think it is new projects manager, and we
4 just presented BE&K as an alternative or another
5 engineering company to, you know, do their engineering.

6 Q. When I say out-source, is that a correct way to
7 put that? Tosco would out-source BE&K or another
8 engineering company?

9 A. Well, sometimes they don't have the engineering
10 facilities themselves, so, yes, you contract them to do a
11 particular job.

12 Q. So they had already been contracting with
13 somebody else, a different company?

14 A. Oh, yes. They did jobs with Jacobs Engineering,
15 and Foster Whaler, major engineering companies.

16 Q. So this was the goal of the meeting, was to
17 solicit?

18 A. That's correct.

19 Q. And you said we met with them, we set up some
20 appointments. Who was the "we"?

21 A. His last name is Lincoln.

22 Q. Lincoln?

23 A. Yes. He is basically, I don't know what title he
24 has, but he looks for jobs.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 81

1 Q. Who else was there?

2 A. Pete Howe was there at a time, he visit halfway,
3 while I was there.

4 Q. Now, whose idea was it to solicit Motiva?

5 A. Are you talking about Tosco now?

6 Q. Tosco, thank you, thank you, thank you. Yes.

7 Whose idea? It was your idea?

8 A. Yes.

9 Q. How did you present that idea?

10 A. Well, BE&K had been, as they say, putting all
11 their eggs in one basket, the DuPont basket, and hardly
12 they were doing any work for anybody else. And since I
13 came from the refining industry and Trexler pretty much
14 came from that industry, we kind of start talking about
15 it, and we start talking to one of the project managers
16 about, you know, let's start contacting these people who
17 have some background in that field.

18 So I had worked for Tosco, and the same
19 thing for Motiva, I had worked for Motiva before, so, you
20 know, I had the contacts, I had the people that I worked
21 with, and one thing is that at Motiva for quite a few,
22 almost years, one or two, they were trying to get at
23 Motiva and they couldn't get in. And because of my visit
24 with the BE&K people, at least we were able to put the



WILCOX & FETZER LTD.
Registered Professional Reporters

B 82

1 foot in the door.

2 Q. Because they knew you, Motiva people knew you?

3 A. Yes.

4 Q. So you went to, was it the project manager that
5 you and John said let's go after some refining business?

6 A. Yes. I think they had the thought awhile before,
7 but, you know, I myself kind of started trying to get the
8 dice rolling.

9 Q. Did John Trexler kind of do the same thing since
10 he had worked there also or did you just sort of run with
11 it?

12 A. No, I think it was myself running with it.

13 Q. Okay. You made the calls to Jenney and Suzanna?
14 Or you just gave Pete and Mr. Lincoln those people's
15 names?

16 A. That part is true, the first part of that
17 question.

18 Q. Okay.

19 A. I didn't call -- well, yes, I made an appointment
20 with Jenney Galli to go up to the refinery, Tosco
21 Refinery.

22 Q. Now, is it normal, did other engineers, process
23 engineers, do this kind of marketing?

24 A. I couldn't tell you. I will say probably not.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 83

1 Q. Probably not. Was it expected of you? Or this
2 was above and beyond?

3 A. No, I think it is above and beyond.

4 Q. Now, tell me, Lincoln, the last name Lincoln, can
5 you tell me more about him? Is he a full-time BE&K
6 employee?

7 A. Yes, he is.

8 Q. And does he work out of the Newark office?

9 A. Correct.

10 Q. He is in some kind of like recruiting of
11 businesses maybe?

12 A. Yes.

13 Q. Marketing too?

14 A. Yes, that will be the best description.

15 Q. Marketing?

16 A. Yes.

17 Q. So him going up to meet, when you, Mr. Lincoln
18 and Pete Howe went to meet at Tosco with their project
19 people, that would have been something he normally did,
20 that's why he went, because he is the person who goes to
21 solicit the client?

22 In other words, I'm trying to think --

23 A. The first visit was between Mr. Lincoln and
24 myself. We went up to New Jersey.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 84

1 Pete Howe came in like after a few months
2 and just to touch base with me and I introduce him to the
3 new supervisor of that group.

4 Q. Somebody besides Jenney and Suzanna?

5 A. Correct.

6 Q. Who was that?

7 A. His last name is Morris.

8 Q. Morris.

9 A. I don't recall his first name.

10 Q. Okay.

11 A. I didn't work with him that long.

12 Q. Let's talk about the Tosco job itself. That
13 started, do we have a time? Any time frame?

14 A. On my new resume it shows, the updated one.

15 Q. I'm just going to show you this, and if this is
16 the right one we will move it in.

17 A. That's correct.

18 Q. Let me put an exhibit sticker on it.

19 A. Let's see here.

20 (Perez Deposition Exhibit 8 was marked for
21 identification.)

22 A. I thought I had within the BE&K section kind of
23 broken down, the jobs, but I didn't do that.

24 Q. When was this resume created?



WILCOX & FETZER LTD.
Registered Professional Reporters

B 85

1 A. This is pretty recent. Let me see. About a
2 year, yes.

3 Q. The Tosco that's listed on this is where you
4 worked prior to --

5 A. Correct.

6 Q. I'm going to just finish the sentence. Prior to
7 BE&K you worked at Tosco, that's what this is
8 referencing? I just wanted to finish the sentence so it
9 was on the record.

10 In other words, it says Tosco is the second
11 company listed, but that's not referencing your time at
12 Tosco, when you were on loan to Tosco during your BE&K
13 employment?

14 A. Correct, that's correct.

15 Q. Got it. Let's go back briefly to Motiva, which
16 was before Tosco, and talk a little bit about that
17 assignment or that project. Were you at that facility or
18 were you at the BE&K facility?

19 A. BE&K.

20 Q. And you talked earlier about you had made some
21 in-roads with them as well, going in and soliciting.
22 Could you tell me about the Motiva, trying to get Motiva
23 business versus the Tosco business, specifically Motiva?

24 A. Yes. I contacted Bill Bell, which he is the



WILCOX & FETZER LTD.
Registered Professional Reporters

B 86

1 engineering department. Sometimes they use the word
2 supervisor or manager. And since he is a key person
3 there, I made an appointment with him. Also, the
4 contract people in the refinery, which is pretty much the
5 one that you need to sell yourself.

6 We went and talked to them. And actually
7 that was really the barrier that BE&K had, that that
8 person there --

9 Q. What was the barrier? What does that mean?

10 A. Well, he wouldn't give BE&K a chance.

11 Q. He wouldn't give?

12 A. Yes.

13 Q. Okay.

14 A. For whatever reason. And I know that when I went
15 in, he had just retired, but the person that was there, I
16 knew him, and I went there with Mr. Lincoln also.

17 Q. So Lincoln had been pursuing Motiva but couldn't
18 get a project with them?

19 A. Yes. Him and Mr. Tony Sinibaldi.

20 Q. Tony Sinibaldi?

21 A. Sinibaldi.

22 Q. Sinibaldi. Sinibaldi, Tony, is Tony the same
23 kind of job as Mr. Lincoln has?

24 A. It is a project manager, but he helps around in



WILCOX & FETZER LTD.
Registered Professional Reporters

B 87

1 pursuing businesses for BE&K.

2 Q. And Tony was in process?

3 A. He was a project manager in general.

4 Q. Which is still slightly different than Mr.
5 Lincoln; is that right?

6 A. Yes, because Mr. Lincoln really was in the
7 marketing, so-called marketing department.

8 Q. So you met with Motiva's new contract person?

9 A. Mm-hmm.

10 Q. Is that a yes?

11 A. Yes. Sorry.

12 Q. And with Tony Sinibaldi and Mr. Lincoln?

13 A. Yes.

14 Q. And then after that, the Motiva project came in?

15 A. Correct.

16 Q. Okay. And did you work on that project?

17 A. Correct.

18 Q. So were you, you kind of marketed yourself as
19 well in saying I would be able to work on this?

20 A. Yes.

21 Q. So you were a selling point for Motiva then?

22 A. From my point of view, yes.

23 Q. Can you tell me briefly the nature of the
24 project?



WILCOX & FETZER LTD
Registered Professional Reporter

B 88

1 A. It was, the project was -- the purpose of the
2 project was due to environmental regulation from the
3 state, and it was basically a few pieces of equipment
4 that one of the gases that they sent to the atmosphere
5 will go first through this piece of equipment, so
6 whatever gases you are sending to the atmosphere will be
7 clean of that particular contaminant.

8 Q. So it was a new device they had to create?

9 A. Yes, you could put it that way.

10 Q. I mean on most basic, basic level.

11 A. Yes.

12 Q. Okay. Who did the design? Was that Motiva did
13 the design and then you came in after that?

14 A. They had another engineering company developing
15 that particular process. BE&K's function was to do the
16 actual engineering, just to make it a reality, you know.

17 Q. Implement it?

18 A. Implement it and make it, you know, from the
19 theory to the physical face.

20 Q. Now, who was the other engineering company that
21 did the idea part?

22 A. I know part of the name -- I don't recall at this
23 time.

24 Q. Did their engineers stay on at that point or they



WILCOX & FETZER LTD.
Registered Professional Reporters

B 89

1 were out of the project?

2 A. They were out. The particular package, BE&K took
3 it from there.

4 Q. And then that project took just under a year; is
5 that about right?

6 A. Oh, no.

7 Q. Motiva?

8 A. That project was not that long. You said under a
9 year?

10 Q. Less than a year?

11 A. I thought you said eight years.

12 Q. Sorry.

13 A. I'm sorry.

14 Q. How long was the project?

15 A. About a year.

16 Q. And then I'm trying to get a time line. Do you
17 know about what time that would have been?

18 A. Okay. I went to the Tosco late 2002. So it had
19 to be at the beginning of 2002, in the range there.

20 Q. So you went, started the Tosco project late 2002;
21 is that about right?

22 A. Yes, going, going up there.

23 Q. Going and starting?

24 A. Yes.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 90

1 Q. So Motiva then would have ended?

2 A. Early 2002. Well, early and probably midway of
3 2002.

4 Q. Fair enough. I am just looking to get the time
5 line straight.

6 A. Could I add something?

7 Q. Of course, yes. Please.

8 A. The Tosco Refining Company at the Trainer
9 Refinery here in Pennsylvania, next to Marcus Hook, I
10 worked there and I also took Mr. Lincoln to them, you
11 know, presenting BE&K.

12 Q. You say "also," you mean in addition to Motiva?

13 A. No, no. In addition to, I said before Motiva,
14 that we went to Tosco Refining Company in Linden, New
15 Jersey. So Tosco Refining Company has this other
16 refinery in Trainer, Pa. It is next to Marcus Hook. And
17 I also took Mr. Lincoln there, because I knew the people,
18 so, you know, he was able to make some contacts.

19 Q. Do you know if any projects came out of that?

20 A. I couldn't tell you. I couldn't tell you.

21 Q. But the Linden project is the one that you went
22 and worked on, that came out of your meeting?

23 A. Yes.

24 Q. I'm going to jump way back in the time line now,



WILCOX & FETZER LTD.
Registered Professional Reporters

B 91

1 A. He was the engineering manager of BE&K.

2 Q. What about halfway, right above the dotted line
3 in the middle of the page, who requested you to be hired?

4 A. Let me see the time frame on this. That's 2000.
5 2000, that's basically when I got into BE&K the second
6 time.

7 Q. So where it says "Requested By" and "Department
8 Manager" in the middle of the page would that be Pete
9 Howe?

10 A. Okay. Got you. Yes.

11 Q. So Pete Howe then was the person who made the
12 decision to hire you then?

13 A. Correct.

14 Q. Now, on the right, the top of the page, about
15 halfway, three lines down on the right-hand side it says
16 "If yes, estimated percent time reimbursable." Do you
17 see that?

18 A. Yes.

19 Q. What does it mean when it says "Position
20 Reimbursable"? Is that a term you are familiar with,
21 "reimbursable"?

22 A. You got me there.

23 Q. Is reimbursable similar to billable?

24 A. Yes, I would say so, yes.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 92

1 counsel.

2 THE WITNESS: Okay.

3 BY MS. DIBIANCA:

4 Q. Can you go ahead and describe what this is,
5 specifically the first page of Perez 10?

6 A. Oh, it is recommendation for salary merit
7 increase, as they call it here.

8 Q. And this is for your increase?

9 A. Correct.

10 Q. And who made the recommendation?

11 A. Has to come from Pete Howe.

12 Q. And his name is at the bottom of the page?

13 A. Correct, on the left side.

14 Q. And the date on this is January 15th, 2002,
15 correct, on the top right?

16 A. Effective date, well --

17 MS. COLES: This is the first one, isn't it?
18 '01.

19 Q. Stand by. I think I have a technical
20 mis-stapling issue. Is your first page EEOC 129?

21 A. No, 124.

22 Q. We did put them in the wrong order. Let's skip
23 to page 2 which would be EEOC 129. Is this the same as
24 the first page, 124, as far as the same form?



WILCOX & FETZER LTD.
Registered Professional Reporters

1 A. That's correct.

2 Q. And it is also a recommendation by Pete Howe for
3 you to get a merit salary increase?

4 A. Correct.

5 Q. And the date on the top right is January 18th,
6 2001?

7 A. That's correct.

8 Q. So this would have been your first raise, it
9 looks like; is that correct?

10 A. Yes.

11 Q. It is indicated as, Roman Numeral III, "Proposed
12 Salary From Spread sheet," there are two columns there,
13 "Proposed Salary" and "Actual Salary Requested." Do you
14 see those?

15 A. Okay, III, "Proposed Salary From Spread sheet."
16 Okay.

17 Q. Now, are you familiar with what that means,
18 "Proposed Salary From Spread sheet"?

19 A. Not really.

20 Q. Are you familiar with "Actual Salary Requested,"
21 what that means?

22 A. Yes. It is self-explanatory.

23 Q. Go ahead and self-explain it to me, though.

24 A. Well, I imagine that Pete Howe requested a



WILCOX & FETZER LTD.
Registered Professional Reporters

B 94

1 salary, particular figure, and he has people above him,
2 like engineering manager, that will have the last word.

3 Q. The final --

4 A. That's the way I understand it.

5 Q. Okay. So then we are going to go back to the
6 first page, which was 124, on Perez 10. And this would
7 have been from January 15th, 2002, correct?

8 A. Correct.

9 Q. So this would have been your second raise?

10 A. That's correct.

11 Q. Generally, were you up for a raise every year?
12 Was it annual?

13 A. Yes.

14 Q. And the final page, which is numbered 119 on
15 Perez 10, and the date on that is January 31st, 2003?

16 A. Right.

17 Q. That was also recommended by Pete Howe?

18 A. Yes, the same.

19 Q. Yes?

20 A. Yes.

21 Q. So all three years that you were employed you
22 received a raise each year?

23 A. Correct.

24 Q. And each year that raise was recommended by Pete



WILCOX & FETZER LTD.
Registered Professional Reporters

B 95

1 Q. And was there any other income you had?

2 A. Not on 2005.

3 Q. At any other time? Go ahead.

4 A. 2005 I didn't have any other income, or for the
5 prior years.

6 Q. All right. We are done with that.

7 Where are you currently employed?

8 A. Physical, the site that I am at, it is Delaware
9 City Refinery. It used to be Motiva. Now it is called
10 Valero.

11 Q. Valero. Valero is the site and then --

12 A. Well, Valero is the new company. The site is the
13 Delaware City Refinery.

14 Q. Okay. Now, tell me, how did you come to be
15 employed at Valero?

16 A. Well, the same sources that I used to refer BE&K
17 to Motiva, I worked there from 1978 to 1990 before, so I
18 know the people, even if it changed names, pretty much
19 the management and everybody else is the same. Am I
20 answering your question?

21 Q. Was this Motiva?

22 A. It used to be. It had names like -- it used to
23 be Getty, Texaco, Star, Motiva, Premcor, and now Valero.

24 Q. Okay. That is probably where my confusion is.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 96

1 All right. So when you say you worked there from 1979 to
2 1990, you mean --

3 A. At that location, up to Texaco.

4 Q. Premco?

5 A. Premcor.

6 Q. Premcor, okay. And is that a different company?

7 A. It used to be. Valero bought them.

8 Q. So Premcor became Valero?

9 A. Yes.

10 Q. I'm just trying to keep up. So did you actually
11 start with Premcor?

12 A. Yes, that's correct.

13 Q. And then when Valero bought it, bought Premcor,
14 you stayed on?

15 A. That's correct.

16 Q. Were you a contract employee when you started at
17 Premcor?

18 A. Correct.

19 Q. Now, where does Allied fit in all of this, Allied
20 Resources?

21 A. Well, they are basically like All States, that
22 type of business. They provide professional services or
23 people to different companies that they are in need for
24 that particular professional.



WILCOX & FETZER LTD.
Registered Professional Reporters

B 97

1 A. Yes.

2 Q. Okay. Did it happen a lot, often that
3 engineers in the process department would have to
4 charge to overhead?

5 A. In between projects? Yes.

6 Q. Yeah, for example.

7 A. Yes.

8 Q. Did people talk about that amongst themselves?

9 A. That's kind of a way of doing things. It's not
10 anything different. It's just taken for granted, if
11 you could say that. If you're in between projects
12 it's overhead.

13 Q. It's not a secret?

14 A. No.

15 Q. Okay. Now, if you were in between projects and
16 you bill to overhead, did management discuss that or
17 no?

18 A. You're aware, like Mr. Pete Howell, he will
19 make you aware that you're overhead. But normally
20 they find something to do for you. An example will be
21 there are some guidelines that they have to review or
22 procedures that they have to be looked at. And
23 writing technical guidelines so the other engineers
24 could follow-up with those guidelines when they do



WILCOX & FETZER LTD.
Registered Professional Reporters

B 98

1 Q. Okay. And what was your annual rating? That
2 would be on the next page at the bottom.

3 A. A "B."

4 Q. Okay. And let's turn to 2003. Let's go to the
5 last page first, 121. What was your annual rating for
6 that period?

7 A. It's a C plus.

8 Q. Okay. And then if you turn back to the prior
9 page, 120, you had made some comments here about the
10 Motiva - CCR vent stack project. Could you tell me
11 what happened with that, as reflected by your
12 comments?

13 MR. ANGLADE: Which comments are you
14 referring to?

15 MS. DiBIANCA: I'm referring to on page
16 EEOC120, the very top it says, "Year in review," and
17 then the second box down, "My accomplishments for 2002
18 are as follows," and then it's numbered 1.

19 A. Okay. I'm going to comment on the part that
20 says my accomplishment for 2002, and specifically I'm
21 going to expand on the lump sum project specifically
22 for Motiva.

23 Q. Okay. And I don't need too much detail,
24 just --



WILCOX & FETZER LTD.
Registered Professional Reporters

B 99

1 A. Well, but I think it's worthwhile --

2 Q. Okay, sure.

3 A. -- what I'll say.

4 This was the first project that BE&K got
5 with Motiva. And as I mentioned prior, Motiva was a
6 client that they were trying to special image, Tony
7 Sinibaldi, to get business for BE&K, and he was having
8 an obstruction especially for, with the man that does
9 the contracting. And it happened that I had worked
10 with that person before, and my goal was -- well, I
11 told Mr. Sinibaldi that I knew the person, and because
12 of that we made a visit to Motiva. As far as I
13 recall, was Mr. Lincoln and myself.

14 It happens that that person had retired,
15 and they had another person, which I knew, his name is
16 John Pachowski. Don't ask me to spell that last name.

17 Q. Okay.

18 A. It happens that Mr. Pachowski recently retired
19 also. Motiva get a package at the end when they knew
20 they were going to be sold.

21 Recall the exact words that Mr. Pachowski
22 told in front of Mr. Lincoln, he told him that I was a
23 very good man, that I worked very well for them
24 before. And from there on, we, in the same visit, we



WILCOX & FETZER LTD.
Registered Professional Reporters

B 100